

Dear Sir/Madam:

The proposed U.S. DOT/FAA - Notice of Proposed Rulemaking (NPRM) identified in docket FAA-2003-16722-1 unnecessarily restricts the ability of Southern California pilots and flight instructors to conduct flight training and recurrency training by changing the present MOA (Military Operating Area) associated with USMC Camp Pendleton, which includes a very active north - south low altitude airway, namely V-23 into the proposed restricted area.

If this rule is implemented, both visual flight rule (VFR) and instrument flight rule (IFR) - including air carrier operations will be forced to conduct hazardous air navigation over water to circumvent flying into the proposed restricted area. Additionally, IFR operations will be impeded thereby increasing air navigation congestion if aircraft are required to fly over and/or around the proposed restricted area.

If control of an airspace segment is required, a special Class D or Class C configuration should be considered to allow normal air commerce to proceed while the military is conducting their proposed operations. Additionally, the DoD should consider using one of their existing firing ranges, such as San Clemente Island to conduct training assaults to simulate the live fire training they desire.

Respectfully submitted,

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